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9  
10 **UNITED STATES DISTRICT COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA**  
12

13 JOHN DOE, an individual,

14 Plaintiff,

15 v.

16 SAIGE STAR ROWLEY, an individual,

17 Defendant.

Case No.

**COMPLAINT FOR:**

**(1) DISCLOSURE OF INTIMATE  
IMAGES, 15 U.S.C. § 6851;**

**(2) INTENTIONAL INFLICTION OF  
EMOTIONAL DISTRESS;**

**(3) UNAUTHORIZED  
COMMERCIAL USE OF  
PHOTOGRAPHS;**

**(4) PUBLIC DISCLOSURE OF  
PRIVATE FACTS; AND**

**(5) VIOLATION OF CALIFORNIA  
CIVIL CODE § 1708.85**

**[JURY TRIAL DEMAND]**

**JURISDICTION AND VENUE**

1  
2 1. The United States District Court has federal question subject matter  
3 jurisdiction over this action based on 28 U.S.C. § 1331, because the complaint  
4 alleges a civil action under 15 U.S.C. § 6851(b)(1)(A).

5 2. Venue is proper because this is the judicial district where the defendant  
6 resides, and because it is where a substantial part of the events or omissions giving  
7 rise to the claim occurred. 15 U.S.C. § 1391(b)(1) and (2).

**PARTIES**

8  
9 3. Plaintiff John Doe is an individual that resides in the County of Los  
10 Angeles, State of California. Plaintiff seeks to use a pseudonym in this action,  
11 pursuant to 15 U.S.C. § 6851(b)(3)(B), to maintain his confidentiality and to prevent  
12 further damage as a result of the actions alleged herein.

13 4. Defendant Saige Star Rowley is an individual, who plaintiff is informed  
14 and believes resides in the County of Los Angeles, State of California.

**GENERAL ALLEGATIONS**

15  
16 5. Plaintiff and defendant were engaged in a consensual, intimate  
17 relationship, off and on, for approximately 2 years and 9 months prior to the events  
18 that give rise to this cause of action.

19 6. On December 4, 2024, defendant pled guilty to having violated Section  
20 237.5(a) of the California Penal Code with respect to plaintiff. That statute provides  
21 that “A person who willfully inflicts corporal injury resulting in a traumatic  
22 condition upon a victim described in subdivision (b) [which includes a victim that  
23 had been in a dating relationship with the offender] is guilty of a felony.” A criminal  
24 protective order was issued at that time, protecting plaintiff from defendant.

25 7. Plaintiff is informed and believes, and on that basis alleges, that in or  
26 about late December 2024 or early January 2025, in revenge for plaintiff’s  
27 participation in the criminal action against defendant, defendant knowingly and  
28

1 intentionally caused at least 21 different intimate visual depictions of plaintiff to be  
2 published on the website www.erome.com (the “Revenge Porn Images”).

3 8. The Revenge Porn Images show plaintiff’s genitals and/or plaintiff  
4 engaging in sexual acts.

5 9. The website on which plaintiff is informed and believes defendant  
6 published the Revenge Porn Images, www.erome.com, is publicly available on the  
7 Internet, and plaintiff is informed and believes that it is in or affects interstate or  
8 foreign commerce or is a means or facility of interstate or foreign commerce.

9 10. Plaintiff did not consent to the Revenge Porn Images being published.

10 11. Plaintiff is informed and believes that defendant had actual knowledge  
11 that plaintiff had not consented and would not consent to the Revenge Porn Images  
12 being published, or, in the alternative, that defendant was recklessly indifferent as to  
13 whether plaintiff had or would have given his consent to such publication.

14 **FIRST CAUSE OF ACTION**

15 **[Unlawful disclosure of intimate images under 15 U.S.C. § 6851(b)]**

16 12. Paragraphs 1 through 11 are incorporated into this cause of action.

17 13. Plaintiff suffered significant economic, emotional, and psychological  
18 damages as a result of the publication of the Revenge Porn Images.

19 14. For each of the 21 Revenge Porn Images that were published as a result  
20 of defendant’s actions, plaintiff is entitled to recover “the actual damages sustained  
21 by the individual or liquidated damages in the amount of \$150,000, and the cost of  
22 the action, including reasonable attorney’s fees and other litigation costs reasonably  
23 incurred.” 15 U.S.C. § 6851(b)(3)(A)(i). Plaintiff therefore seeks damages of at least  
24 \$150,000 for each of the 21 images, totaling \$3,150,000.

25 15. Plaintiff also seeks injunctive relief, requiring defendant to cease and  
26 desist from displaying and disclosing the Revenge Porn Images, to deliver all data  
27 storage devices and accounts on which she has saved or stored the Revenge Porn  
28 Images to counsel for plaintiff, and to account for all copies of the Revenge Porn

1 Images, as well as all related data storage repositories, that she has had in her  
2 possession, custody, or control. 15 U.S.C. § 6851(b)(3)(A)(ii).

3 **SECOND CAUSE OF ACTION**

4 **[Intentional Infliction of Emotional Distress]**

5 16. Paragraphs 1 through 11 are incorporated into this cause of action.

6 17. Plaintiff is informed and believes that defendant's publishing of the  
7 Revenge Porn Images constituted extreme and outrageous conduct, which exceeded  
8 all bounds of decency that are usually tolerated in a civilized society.

9 18. Plaintiff is informed and believes that defendant published the Revenge  
10 Porn Images with the intent to cause plaintiff to suffer severe emotional distress.

11 19. Plaintiff suffered severe emotional distress as the direct and proximate  
12 result of the publishing of the Revenge Porn Images, which plaintiff is informed and  
13 believes was perpetrated by the defendant.

14 20. Plaintiff is entitled to judgment in an amount to compensate him for the  
15 emotional distress that he suffered, as well as amounts spent or to be spent on  
16 combatting and removing the Revenge Porn from the internet. Plaintiff therefore  
17 seeks damages in an amount according to proof.

18 21. Plaintiff also seeks punitive damages, because defendant acted with  
19 oppression, fraud or malice.

20 22. Plaintiff further seeks injunctive relief, requiring defendant to cease and  
21 desist from displaying and disclosing the Revenge Porn Images, to deliver all data  
22 storage devices and accounts on which she has saved or stored the Revenge Porn  
23 Images to counsel for plaintiff, and to account for all copies of the Revenge Porn  
24 Images, as well as all related data storage repositories, that she has had in her  
25 possession, custody, or control.

26 **THIRD CAUSE OF ACTION**

27 **[Unauthorized Commercial Use Of Photographs]**

28 23. Paragraphs 1 through 11 are incorporated into this cause of action.

1           24. Plaintiff is informed and believes that defendant's publishing of the  
2 Revenge Porn Images constituted an unauthorized commercial use of plaintiff's  
3 photographs in violation of Section 3344 of the California Civil Code and the  
4 California common law right of publicity.

5           25. Plaintiff suffered general or special damages as a result of the  
6 distribution of the Revenge Porn Images, including those set forth in Cal. Civ. Code  
7 § 48(d)(1) and (d)(2).

8           26. Plaintiff is entitled to judgment in an amount equal to the greater of  
9 seven hundred fifty dollars per image or the actual damages suffered by him as a  
10 result of the unauthorized publication, as well as any profits attributable to such use.  
11 Plaintiff therefore seeks damages of at least 21 x \$750, which is \$15,750, or actual  
12 damages if greater, according to proof.

13           27. Plaintiff also seeks punitive damages, because defendant acted with  
14 oppression, fraud or malice.

15           28. Plaintiff further seeks injunctive relief, requiring defendant to cease and  
16 desist from displaying and disclosing the Revenge Porn Images, to deliver all data  
17 storage devices and accounts on which she has saved or stored the Revenge Porn  
18 Images to counsel for plaintiff, and to account for all copies of the Revenge Porn  
19 Images, as well as all related data storage repositories, that she has had in her  
20 possession, custody, or control.

21                                   **FOURTH CAUSE OF ACTION**

22                                   **[Public Disclosure of Private Facts]**

23           29. Paragraphs 1 through 11 are incorporated into this cause of action.

24           30. Plaintiff is informed and believes that defendant's publishing of  
25 Revenge Porn constituted an invasion of his privacy, because it constituted a public  
26 disclosure of private facts that would be objectionable to a reasonable person.  
27  
28

31. Plaintiff suffered general or special damages as a result of the distribution of the Revenge Porn Images, including those set forth in Cal. Civ. Code § 48(d)(1) and (d)(2).

32. Plaintiff seeks judgment in an amount to compensate him for the damages that he suffered, as well as amounts spent or to be spent on combatting and removing the Revenge Porn from the internet.

33. Plaintiff also seeks punitive damages, because defendant acted with oppression, fraud or malice.

34. Plaintiff further seeks injunctive relief, requiring defendant to cease and desist from displaying and disclosing the Revenge Porn Images, to deliver all data storage devices and accounts on which she has saved or stored the Revenge Porn Images to counsel for plaintiff, and to account for all copies of the Revenge Porn Images, as well as all related data storage repositories, that she has had in her possession, custody, or control.

## FIFTH CAUSE OF ACTION

**[Action Based On California Civil Code § 1708.85]**

35. Paragraphs 1 through 11 are incorporated into this cause of action.

36. Plaintiff is informed and believes that defendant intentionally distributed the Revenge Porn Images.

37. Plaintiff is informed and believes that defendant knew, or reasonably should have known, that plaintiff had a reasonable expectation that the Revenge Porn Images would remain private.

38. The Revenge Porn Images exposed an intimate body part of plaintiff and/or showed plaintiff engaging in an act of intercourse, oral copulation, sodomy, or other act of sexual penetration.

39. Plaintiff suffered general or special damages as a result of the distribution of the Revenge Porn Images, including those set forth in Cal. Civ. Code § 48(d)(1) and (d)(2).

1           40. Plaintiff seeks judgment in an amount to compensate him for the  
2 damages that he suffered, as well as amounts spent or to be spent on combatting and  
3 removing the Revenge Porn from the internet.

4           41. Plaintiff also seeks punitive damages, because defendant acted with  
5 oppression, fraud or malice.

6           42. Plaintiff further seeks injunctive relief, requiring defendant to cease and  
7 desist from displaying and disclosing the Revenge Porn Images, to deliver all data  
8 storage devices and accounts on which she has saved or stored the Revenge Porn  
9 Images to counsel for plaintiff, and to account for all copies of the Revenge Porn  
10 Images, as well as all related data storage repositories, that she has had in her  
11 possession, custody, or control.

12                                   **PRAYER FOR RELIEF**

13       Plaintiff prays for judgment against defendant as follows:

14       A.     On the first cause of action:

- 15           a. The greater of \$3,150,000 in liquidated damages or actual damages  
16           suffered by plaintiff, pursuant to 15 U.S.C. § 6851(b)(3)(A)(i).  
17           b. Reasonable attorney's fees and other litigation costs reasonably  
18           incurred by plaintiff, pursuant to 15 U.S.C. § 6851(b)(3)(A)(i).  
19           c. Injunctive relief, requiring defendant to cease and desist from  
20           displaying and disclosing the Revenge Porn Images, to deliver all  
21           data storage devices and accounts on which she has saved or stored  
22           the Revenge Porn Images to counsel for plaintiff, and to account for  
23           all copies of the Revenge Porn Images, as well as all related data  
24           storage repositories, that she has had in her possession, custody, or  
25           control, pursuant to 15 U.S.C. § 6851(b)(3)(A)(ii).

26       B.     On the second cause of action:

- 27           a. General damages according to proof.  
28           b. Special damages according to proof.

1 c. Punitive damages.

2 d. Injunctive relief, requiring defendant to cease and desist from  
3 displaying and disclosing the Revenge Porn Images, to deliver all  
4 data storage devices and accounts on which she has saved or stored  
5 the Revenge Porn Images to counsel for plaintiff, and to account for  
6 all copies of the Revenge Porn Images, as well as all related data  
7 storage repositories, that she has had in her possession, custody, or  
8 control.

9 C. On the third cause of action:

10 a. The greater of \$15,750 or actual damages according to proof; and

11 b. Punitive damages.

12 c. Injunctive relief, requiring defendant to cease and desist from  
13 displaying and disclosing the Revenge Porn Images, to deliver all  
14 data storage devices and accounts on which she has saved or stored  
15 the Revenge Porn Images to counsel for plaintiff, and to account for  
16 all copies of the Revenge Porn Images, as well as all related data  
17 storage repositories, that she has had in her possession, custody, or  
18 control.

19 D. On the fourth cause of action:

20 a. General damages according to proof.

21 b. Special damages according to proof.

22 c. Punitive damages.

23 d. Injunctive relief, requiring defendant to cease and desist from  
24 displaying and disclosing the Revenge Porn Images, to deliver all  
25 data storage devices and accounts on which she has saved or stored  
26 the Revenge Porn Images to counsel for plaintiff, and to account for  
27 all copies of the Revenge Porn Images, as well as all related data  
28



1 storage repositories, that she has had in her possession, custody, or  
2 control.

3 E. On the fifth cause of action:

4 a. General damages according to proof.

5 b. Special damages according to proof.

6 c. Punitive damages.

7 d. Injunctive relief, requiring defendant to cease and desist from  
8 displaying and disclosing the Revenge Porn Images, to deliver all  
9 data storage devices and accounts on which she has saved or stored  
10 the Revenge Porn Images to counsel for plaintiff, and to account for  
11 all copies of the Revenge Porn Images, as well as all related data  
12 storage repositories, that she has had in her possession, custody, or  
13 control.

14 F. In addition, on each cause of action:

15 a. Reasonable attorneys' fees incurred by plaintiff;

16 b. Court costs; and;

17 c. Any other relief that the Court deems appropriate.

18  
19 DATED: February 19, 2025 BLANK ROME LLP

20  
21 By: /s/ Jeffrey Rosenfeld  
22 Jeffrey Rosenfeld  
23 Attorney for Plaintiff John Doe  
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**JURY TRIAL DEMAND**

Plaintiff demands a trial by jury.

DATED: February 19, 2025 BLANK ROME LLP

By: /s/ Jeffrey Rosenfeld  
Jeffrey Rosenfeld  
Attorney for Plaintiff John Doe